EXHIBIT B

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE DIVISION

CABINETS TO GO, LLC, Plaintiff,)))
riamum,	
vs.) CASE NO.: 3:21-cv-00711
QINGDAO HAIYAN REAL ESTATE GROUP CO., LTD;	Chief Judge Waverly D. Crenshaw, Jr.
QINGDAO DROUOT WOOD INDUSTRY CO. LTD.,	Magistrate Judge Jeffrey S. Frensley
ALNO INDUSTRY SDN BHD, and SCIOTO VALLEY WOODWORKING,	
INC. d/b/a VALLEYWOOD	
CABINETRY,	
Defendants.	

DECLARATION OF LIYAN JIAO

Liyan Jiao, pursuant to 28 U.S.C. § 1746 hereby declares as follows:

- 1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in the foregoing Declaration is based on my personal knowledge.
- 2. I am the Presidentof Qingdao Haiyan Real Estate Group Co., Ltd.("Haiyan"). I submit this Declaration in support of Defendants' Reply in Support of Motion to Dismiss.
- 3. I am the primary shareholder of Haiyan, Qingdao Drouot Wood Industry Co., LTD ("Drouot"), Alno Industry SDN BHD ("Alno") and Scioto Valley Woodworking, Inc., ("Valleywood"). Each corporation maintains its own independent control and operates independently as a separate legal entity. Each has its own Board of Directors, maintains separate

books, separately files taxes in its home country, owns property in its own respective name, has separate offices, hires and maintains its own workforce and enters into binding contracts independently from my ownership interest and the other corporations.

- 4. No employee of Haiyan travelled to Tennessee in "late" 2019, as alleged by CTG.
- 5. The first time I met Mr. Delves and Mr. Sullivan in person was on January 12, 2020 at CTG's Leadership Summit (the "Summit") in Franklin, Tennessee.
 - 6. No employee of Haiyan traveled to Tennessee after January 2020.
- 7. Prior to receiving CTG's sponsorship request for the Summit, I hadmade plans to travel to the US in January 2020 to tour the Kitchen and Bath Industry Show in Las Vegas, NV. My wife and I also planned a personal trip to visit our son Jian "Philip" Jiao in Columbus, OH. I accepted the invitation for Haiyan to attend the Summit because Haiyan representatives would already be in the US.
- 8. The sponsorship for the Summit was solicited by CTG and the \$15,000 was solely offered by Haiyan in honoring the business relationship between Haiyan and CTG. Haiyan attended the Summit in Tennessee from January 12 to 14, 2020, where Haiyan brought and presented its new product lines at CTG's request.
- 9. Haiyan did not solicit any business or visit any other customers while in Tennessee for the Summit.
- 10. Jian "Philip" Jiao is my son. He is currently a law student at The Ohio State University Moritz College of Law in Columbus, Ohio.
- 11. While studying at Indiana University-Bloomington, from May 2016 to August 2016, and May 2017 to August 2017, Jian completed summer internshipswith Haiyan. From May

2018 to July 2019, Jian's gap year between undergraduate and law school, he worked as a manager for Valleywood Cabinetry in Waverly, Ohio.

- 12. Jian no longer works at either company since his law school enrollment in July 2019. He is currently and has been a full-time law student from August 2019 to present.
- 13. Since August 2019, because Jian is in the United States and understands English, Jianwas asked at various times by several Haiyan employees to help with transportation, interpretation, or other ministerial tasks from time to time. Jian has never had any ownership role for any of the Defendant companies in this litigation or authority to bind any of the Defendants.
- 14. Jian attended the Leadership Summit in January 2020 with me to visit his family and to assist with translation.
- 15. It was in Jian's role assisting me with translation and interpretation that he corresponded with Jason Delves regarding CTG's interest in purchasing Valleywood.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 16 - 03, 2022.

Liyan Jiao